

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Sunset of the Requirement that Cellular)	WT Docket No. 01-108
Systems Maintain Analog Transmission)	
Capacity through February 18, 2008,)	
Rule Section 22.901(b))	

To: The Commission

**EX PARTE COMMENTS OF
ADT SECURITY SERVICES, INC.**

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Filed: October 4, 2006

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Summary

ADT Security Services, Inc. (“ADT”) hereby submits its comments in the above-captioned matter. In general, ADT supports the comments submitted on February 21, 2006 by the Alarm Industry Communications Council (“AICC”), demonstrating that analog-based security radios play a key role in helping protect lives and property, and that there is simply not enough time between now and February 18, 2008 to replace all of the existing radios with digital equipment. Moreover, ADT wishes to advise the FCC that it has been working for the past several years with law enforcement officials and women’s shelters to provide analog-based “panic buttons” to victims of domestic abuse – one of the groups that the Commission has recognized as requiring protection from the adverse effects of the analog sunset process. ADT therefore joins in AICC’s request that the analog sunset be extended an additional two years, *i.e.*, until February 18, 2010. In addition, ADT requests that the Commission and the cellular industry take steps to ensure that analog service is not degraded before the Sunset date, since such degradation threatens the reliability of service for analog radio users. Public safety is the cornerstone of the alarm industry. With customers across the residential, commercial and government spectrum, the industry offers life safety services including intrusion, fire, critical environment condition (carbon monoxide, flood, and temperature extremes) and health monitoring. With over one million customers utilizing analog alarm radio devices, these services will be impacted by the February, 2008 AMPS Sunset date, putting individuals, businesses and communities at risk.

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To: The Commission

Ex Parte Comments of ADT Security Services, Inc.

ADT Security Services, Inc. ("ADT"), by its attorney and pursuant to the Commission's Public Notice, entitled "*Wireless Telecommunications Bureau Reminds Cellular Licensees Of Analog Reporting Requirement*," Mimeo DA 05-3015, dated November 30, 2005 (the "November 30, 2005 Public Notice") and Public Notice, entitled "*Electronic Filing Of Analog Cellular Status Reports Will Be Available Through The Internet Beginning January 25, 2006 (Reports due by February 21, 2006)*", Mimeo DA 06-133, dated January 23, 2006, hereby submits its *ex parte* comments in this matter. In general, ADT supports the comments submitted on February 21, 2006 by the Alarm Industry Communications Council ("AICC"), demonstrating that analog-based security radios play a key role in helping protect lives and property, and that there is simply not enough time between now and February 18, 2008 to replace all of the existing radios with digital equipment. Moreover, ADT wishes to advise the FCC that it has been working for the past several years with law enforcement officials and women's shelters to provide

analog-based “panic buttons” to victims of domestic abuse – one of the groups that the Commission has recognized as requiring protection from the adverse effects of the analog sunset process. ADT therefore joins in AICC’s request that the analog sunset be extended an additional two years, *i.e.*, until February 18, 2010. In addition, ADT requests that the Commission and the cellular industry take steps to ensure that analog service is not degraded before the Sunset date, since such degradation threatens the reliability of service for analog radio users. In support hereof, the following is shown:

Statement of Interest

ADT is the largest single provider of electronic security services, with more than six million commercial, government and residential customers throughout North America. ADT has been providing security services for more than one hundred years, and is a member of the Central Station Alarm Association (CSAA) and the related AICC. The essence of ADT’s business is to help protect people from the unpredictable. ADT is trusted to help safeguard the things its customers value most – their families, employees, communities, homes, businesses and assets.

ADT also helps protect a wide range of sensitive public facilities and their occupants from fire, burglaries, sabotage and other emergencies. These facilities include government installations, such as Federal Courthouses and National Guard training centers ; nearly one hundred public airports (including Martin State Airport, which also serves as the home base of the 135th Airlift Group and 175th Fighter Group of the Maryland Air National Guard); public port facilities, such as the Port of Oakland,

California; as well as numerous power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, schools and universities. ADT provides not only fire and burglary security services, but also provides medical alert services so that disabled or at risk persons may obtain assistance in the event of medical emergencies.

Like many other alarm companies, ADT recommends radio units installed at the customer premises as either the primary or backup means of transmitting signals to the central station alarm monitoring center, so that intruders cannot defeat an alarm signal by simply cutting the telephone line. In addition, wireless devices are intended to allow fire alarms to go through even if the telephone connection has been damaged by fire. ADT also offers its customers a wireless “panic button” that will notify its Monitoring Center to summon the police or medical personnel in the event of an emergency. Persons that wear a panic button (which comes in the form of a pendant necklace or wrist-watch device) can summon help even if they are blocked from reaching their telephone; and the need to push only one button makes it possible to send an alarm signal when there is not enough time to dial the telephone (e.g., in the case of a physical attack by an intruder) or when the victim of a medical emergency is losing consciousness or otherwise lacks the physical or mental ability to remember and dial a telephone number. Many of the systems that include these panic button systems utilize analog cellular service.

As detailed below, the impending AMPS Sunset timeline will compromise ADT’s ability to help protect these persons and businesses in the event of an emergency.

Therefore, ADT supports the request of AICC that Commission extend the sunset of the Rule Section 22.901(b) analog transmission capability requirement by an additional two years, *i.e.*, through February 18, 2010.

**The Commission Should Extend The
Analog Cellular Sunset Date For An Additional Two Years**

Public safety is the cornerstone of the alarm industry. With customers across the residential, commercial and government spectrum, the industry offers life safety services including intrusion, fire, critical environment condition (carbon monoxide, flood, and temperature extremes) and health monitoring. With over one million customers utilizing analog alarm radio devices¹, these services will be impacted by the February, 2008 AMPS Sunset date, putting individuals, businesses and communities at risk.

More particularly, cellular alarm radios are part of the monitoring services at a variety of government and commercial installations throughout the country. These are used to help protect the safety of the public, as well as financial assets and property at banks, manufacturing facilities, retail establishments, government facilities and government contractor locations. There are multiple government contractors and National Guard Reserve Centers that utilize cellular transmission as both the primary and secondary means of transmission to the ADT Monitoring Center. These examples illustrate the comprehensive nature of ADT's analog cellular radio deployment, and its important role in helping secure critical infrastructure and commercial locations in

¹ AICC Comments to the FCC, filed February 21, 2006.

addition to residential customers. ADT describes below other factors that must be considered in determining whether the current analog Sunset deadline is realistic.

ADT has stopped installing analog cellular alarm radios in both direct and indirect distribution channels except in select cases in which there is poor digital cellular coverage. The process of upgrading analog cellular alarm radio customers, to meet the February 18, 2008 Sunset deadline, will require a tremendous and immediate increase in ADT's service and installation labor force. This is over and above the labor needed to meet the requirements of standard business operations. ADT has taken steps toward implementing its comprehensive AMPS cellular alarm radio replacement plan when a steady supply of digital cellular alarm radios becomes available. But with less than 16 months until the Sunset, this is a gargantuan task for ADT and the alarm industry, since new units must physically be installed in more than one million residential, commercial and government locations industry-wide.

In addition, the only cellular alarm radios available to the market within the next quarter operate on GSM cellular networks. The lack of alternative signaling formats (i.e., CDMA) will leave many customers without adequate coverage. Due to the combination of these factors, there is a high probability that the alarm industry will not be able to complete upgrades to digital cellular alarm radios by the February 18, 2008 Sunset, thus putting public safety at risk. An immediate response from the FCC on this request for an AMPS Sunset extension will serve to clarify for ADT how it is to scope and scale deployment of the massive resources needed to satisfy the FCC ruling.

A. The Current Sunset Deadline Will Have An Adverse Effect On Victims Of Domestic Abuse.

ADT is using analog cellular devices to help protect battered women, one of the groups recognized in WT Docket No. 01-108 as requiring access to analog service until a replacement technology can be deployed. The National ADT AWARE® (Abused Women's Active Response Emergency) program helps to protect people from abusive partners. Victims who are at the highest level of risk for lethal attack are selected by law enforcement officials, domestic violence shelter administrators and representatives of prosecutor's offices to be provided with an electronic security system, emergency pendant and 24-hour monitoring. If a victim feels threatened when in their home or yard, the pendant's button is pressed and a signal is sent through the alarm communication device. The police/authorities are then notified by ADT's Monitoring Center.

The cellular component drastically reduces the possibility that an abuser can defeat the system by cutting the phone line or preventing the victim from dialing a traditional phone. The panic button sends the alarm upon the press of a single button. This solution is integral to providing a high level of protection to this extremely vulnerable segment of the population. To date, most ADT AWARE® kits contain AMPS cellular radios which must be replaced by digital devices.

The ADT AWARE® program has been established in 170 communities, including but not limited to the major metropolitan areas of Atlanta, Denver, Detroit, New York, San Francisco, Seattle, St. Louis and Pittsburgh, as well as multitudes of smaller

communities throughout the country. The program is credited with helping to save the lives of at least 34 people in the 14 years since its founding, and has enabled thousands of persons to summon help when placed in a position of personal threat. The ADT AWARE program is free. There is no charge to the victims or their communities. Testimonials from beneficiaries and administrators of the AWARE program are included in Attachment A hereto. As noted by Walt Monegan, Anchorage Chief of Police, “The AWARE program provides a viable alternative should a victim be unable to reach a telephone to summon help. The cellular backup incorporated into the AWARE program security equipment eases the constant fear and concern victims feel. It gives me peace of mind as well, knowing our citizens are able to live a less stressful life.”

The Commission specified that the analog cellular capacity requirement would expire five years following the date of publication of the AMPS Sunset Order in the Federal Register, which, in the Commission’s view would be sufficient time to allow the more widespread availability of digital air interface technologies (e.g., CDMA and GSM) to meet the needs of certain classifications of consumers, such as persons with hearing disabilities, telematics providers, and “emergency-only users” (e.g., the elderly and battered women), who continue to rely on analog service due to the absence of digital alternatives.² As described above, the alarm industry serves approximately one million people whose systems utilize AMPS service, *including victims of domestic violence*. Therefore, the Commission must make sure that the Sunset deadline does not deprive

² Year 2000 Biennial Review – Amendment of Part 22 of the Commission’s Rules to Modify or Eliminate Outdated Rules Affecting the Cellular Radiotelephone Service and Other Commercial Mobile Radio Services, WT Docket No. 01-108, *Report and Order*, 17 FCC Rcd. 18401 (2002) (the “AMPS Sunset Order”), at Para. Nos. 6, 8, 18-20, 22, 23, 24, 28 and 29.

these protected classes of analog users of their link to emergency assistance. As the Commission has noted, “we seek to ensure that eliminating the analog compatibility standard does not adversely affect existing analog subscribers, or groups that are particularly dependent on access to analog-based cellular technology. We are therefore reluctant to eliminate this requirement if doing so will significantly impair the access of these users to wireless telecommunications services.”³

In this proceeding, the Commission based the AMPS Sunset date in part on the *assumption* that five years would be adequate for battered women, emergency-only radio users and others to migrate to digital technology based on the introduction of digital substitutes through natural churn. AMPS Sunset Order, para. 25. Unfortunately, substitute digital equipment is just becoming available in the GSM format; and the upgrade process for the industry’s customer base is unlikely to be complete prior to the Sunset date. This is true for the million customer premises alarm radios that have to be replaced, including the radios for the panic button systems used by domestic violence victims under the ADT AWARE® program. Since the Commission’s assumption regarding the availability and deployment of digital replacement radios has not transpired in the manner originally assumed by the AMPS Sunset Order, the Commission should revisit this assumption and extend the Sunset deadline. See Aeronautical Radio, Inc. v. FCC, 928 F.2d 428, 445 (D.C. Cir. 1991) (deferring to the Commission’s predictive judgment “with the caveat, however, that, should the Commission’s predictions ... prove

³ Year 2000 Biennial Review – Amendment of Part 22 of the Commission’s Rules to Modify or Eliminate Outdated Rules Affecting the Cellular Radiotelephone Service and Other Commercial Mobile Radio Services, WT Docket No. 01-108, Notice of Proposed Rule Making, 16 FCC Rcd. 11169 (2001) (the “AMPS Sunset NPRM”), at Para. No. 31.

erroneous, the Commission will need to reconsider its [decision] in accordance with its continuing obligation to practice reasoned decision-making”).

The Commission has also specified that, during the five-year transition period, “service providers can conduct customer outreach in order to educate consumers that analog services may be discontinued on a date certain, thereby providing emergency-only consumers with time to migrate from analog to digital handsets.”⁴ The Commission further specified a requirement that nationwide carriers file certain reports as the five-year Sunset date draws near.⁵ One of the topics stated for inclusion in these reports is for each reporting carrier to “describe their plan for informing its subscribers, the public and other interested parties regarding plans to discontinue analog service.”⁶ Unfortunately, the provision of panic button service to domestic violence victims has not been a high profile program, and it has not been a subject of focus by either the cellular industry or the Commission in evaluating the impact of the AMPS Sunset. Thus, to date there has been no “customer outreach” to this category of AMPS users, and no reporting about this aspect of the impending analog shut down. ADT urges the Commission to take this important safety program into consideration in deciding whether to extend the Sunset deadline. Domestic violence is a widespread and serious problem in the United States which cuts across both economic and racial boundaries. Intimate partner violence is primarily a crime against women. In 2001, women accounted for 85 percent of the victims of intimate partner violence (588,490 total) and men accounted for approximately

⁴ AMPS Sunset Order, Para. No. 24.

⁵ AMPS Sunset Order, Para. Nos. 31 – 34.

⁶ AMPS Sunset Order, Para. No. 31.

15 percent of the victims (103,220 total) according to the Bureau of Justice Statistics Crime Data Brief (February 2003).

B. The Lack of Equipment Availability and Logistics for Converting AMPS-based Alarm Radios Require That More Time Be Granted.

As described in AICC's Comments, the supply of digital cellular alarm radios is constrained, since only one large commercial manufacturer (Telular) is producing replacement digital radios. These units operate only on GSM networks, and have geographic coverage limitations. With the GSM products available from Telular, the alarm industry has perhaps adequate product availability for new placements, but does not have sufficient product to begin an aggressive analog swap-out program. No manufacturer has indicated to ADT that it is currently providing CDMA replacement units. This is significant since some geographic areas have only CDMA coverage or CDMA is the only network with sufficient signal strength to provide reliable monitoring services. Examples include, but are not limited to various cities in Virginia.

ADT has stopped deployment of analog cellular alarm radios, except in certain areas in which there is poor digital cellular coverage. Several locations in Virginia, Iowa, Illinois and Arizona have been identified where the digital coverage is significantly inferior to analog coverage. In these areas, installation of digital equipment would lead to poor or no service, putting ADT's customers at risk that their alarm signal could not be transmitted. To ensure a seamless transition and reliable alarm service for customers, there must be a longer time period when the analog and digital networks overlap. At a

minimum, digital networks must provide the same quality (in terms of coverage and capacity) as the analog networks they are replacing.

Fortunately, the alarm industry is taking great strides toward replacing AMPS radios at the earliest practical time. In the fourth quarter of 2006, several additional vendors, such as Honeywell, have begun to ship digital cellular alarm radio products. However, as with all new products, ramp-up issues are anticipated, and it will take time before the new radios can be produced in volume.

The Alarm Industry estimates that there are more than one million analog cellular radio devices in service domestically. Assuming unrestricted product availability in October 2006 (16 months prior to the AMPS Sunset), the industry would be required to convert an average of 62,500 units per month. However, there is no widespread availability of replacement radios by October 2006; and this ambitious replacement schedule does not take into account the demand for digital radios created by new customer orders. As more customers adopt Voice over Internet Protocol ("VoIP") and other digital phone technologies in place of traditional landline phone service, the demand for cellular alarm radios has skyrocketed. Over the past year, ADT cellular radio demand has doubled. This is exacerbating supply issues by approximately 10,000 units per month to increase industry demand to over 70,000 units per month.

Moreover, even if equipment availability was not at issue, there is simply not enough time and resources to replace all of the analog alarm radios in sixteen months. Every analog to digital cellular alarm radio conversion requires scheduling a service call with

the customer (whether residential, commercial or government). Each service call will take the technician at least two to three hours, since they must remain at the customer location after the installation until the wireless carrier activates the units and communication with the alarm company central station is verified.

In the case of residential installations, it is often difficult to set up a replacement because the homeowner is at work during business hours. Industry statistics reveal that 25 percent of appointments require rescheduling, due to the customer's unavailability when a technician arrives at their home/business. This factor must be added when calculating total installation hours. Assuming an average of 2.5 hours per installation, it is estimated that the 62,500 industry conversions will take 156,250 hours per month for 16 months. With the 25 percent rescheduling factor, conversion time increases to over 195,000 hours per month, or the equivalent of 4,875 additional trained technicians working 40 hours per week for 16 months. A labor pool with the proper training and skill sets to carry out the needed one million conversions is simply not available at this time.

Absent extension of the Sunset date, the impact on public safety could be severe, because arson, accidental fires, carbon monoxide leaks and burglary can result in the death of innocent persons. As noted above, central station alarm companies installed the analog cellular units at the customer's premises as a radio mechanism to report a fire or break-in to the central monitoring station. A primary reason customers have these radio units installed at their premises is because burglars and arsonists often attempt to disable the central station alarm by cutting the telephone lines ordinarily used to transmit the

monitoring signals to the central station. If the analog alarm radios stop working before they can be replaced, many fires and burglaries will simply go unreported in real time, thus increasing the odds that innocent persons will be seriously injured or killed, and reducing the odds that the malefactors will be captured quickly and prevented from engaging in other similar crimes at other locations. In the case of consumers using their alarm radios to relay medical alert signals, the threat to life and health from failed radio operations is grave.

The Commission and the Cellular Industry Should Ensure that AMPS Service Is Not Reduced Ahead Of The Sunset Deadline

The Commission adopted the analog cellular sunset rule⁷ as part of its Year 2000 Biennial Regulatory Review of regulations codified in Part 22 of the Rules. The rule generally provides that, “[u]ntil February 18, 2005, each cellular system that provides two-way cellular mobile radiotelephone service” must “maintain the capability to provide compatible analog service (‘AMPS’) to cellular telephones designed” to operate using the analog air interface;⁸ and to “[p]rovide AMPS, upon request, to subscribers and roamers using such cellular telephones while such subscribers are located in any portion of the cellular system’s CGSA where facilities have been constructed and service to subscribers has commenced.”⁹ As a concurrent requirement, the Commission specified that, until February 18, 2008, “[c]ellular licensees must allot sufficient system resources such that

⁷ Codified in Section 22.901(b) of the Rules.

⁸ Rule Section 22.901(b)(1).

⁹ Rule Section 22.901(b)(2).

the quality of AMPS provided, in terms of geographic coverage and traffic capacity, is fully adequate to satisfy the concurrent need for AMPS availability.”¹⁰

Despite these clear cut requirements of Rule Section 22.901, ADT is finding that analog service has suffered degradation in certain areas, with potentially harmful consequences for existing users. ADT has already documented instances of reduced AMPS service quality in several metropolitan areas, including markets such as Miami, Florida, Totowa, New Jersey and the Gulf Coast region. The potentially adverse consequences of these analog service reductions are immediate, since ADT’s customers may be unknowingly left without service to ADT’s Central Monitoring Center at the time of an emergency. Thus, if an emergency occurs, secured premises in areas in which AMPS coverage has been compromised may not be able to reach help via their alarm radios.

Such service problems across the country appear to be due to the reconfiguration or removal of AMPS channels ahead of the February 2008 Sunset date. Some network operators are reclaiming part of the spectrum devoted to analog service ahead of time, apparently in the mistaken belief that sufficient analog coverage still exists from nearby towers. This practice has put thousands of customers at risk that their alarm signals may not be transmitted.. In several cases, the cellular carrier has restored service when the issue was brought to their attention, but only after the reliability of the alarm customers radio systems were jeopardized for a substantial period of time. Therefore, the Commission should remind cellular carriers that they must allot sufficient system resources “such that the quality of AMPS provided, in terms of geographic coverage and

¹⁰ Rule Section 22.901(b)(2).

traffic capacity, is fully adequate to satisfy the concurrent need for AMPS availability.”

This service quality must be adequate to support existing analog alarm devices until they can be replaced with digital radios.

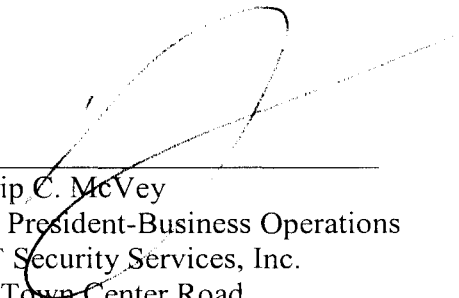
ADT also supports AICC’s request that the Commission build into any AMPS transition order an instruction that all affected parties work together to develop a reasonable notification procedure to give AMPS radio users fair notice (preferably at least 180 days) in advance of AMPS being shut down in a particular geographic area. This notification process would allow alarm companies and other affected AMPS customers to devote their transition resources in an orderly and efficient fashion, rather than scrambling to change out radios throughout the entire country all at once. In contrast, ADT has been told by one nationwide wireless carrier that their entire AMPS network will be turned off on February 19, 2008.

Conclusion

ADT requests that the Commission extend the analog Sunset date by an additional two years, up to and including February 18, 2010, and to incorporate an orderly notification procedure into the AMPS transition requirements. ADT also requests that the Commission remind cellular carriers of their obligation to provide reliable analog service throughout the period of time remaining before the sunset date.

Respectfully submitted,

ADT Security Services, Inc.

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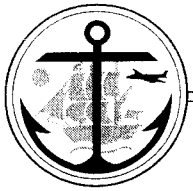
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Filed: October 4, 2006

ATTACHMENT A

TESTIMONIALS CONCERNING THE ADT AWARE PROGRAM



Municipality of Anchorage

4501 Bragaw Street • Anchorage, Alaska 99507-1599 • Telephone (907) 786-8500 • <http://www.muni.org>



Mayor Mark Begich

Anchorage Police Department July 14, 2006

Mr. John Koch
Chief Operating Officer
ADT Security Services, Inc.
One Town Center Drive
Boca Raton, FL 33486

Dear Mr. Koch:

We are grateful to ADT for bringing the life-saving AWARE Program to our community to help protect victims of domestic violence.

The program has not only helped protect people in grave danger, but has also given these victims peace of mind, knowing that law enforcement can be rapidly summoned with the push of a button.

Domestic violence victims in the AWARE Program have been physically and mentally abused by their partners. These abusers continue to harass their victims-despite protective orders-by stalking, calling, threatening and continuing to do physical harm.

The AWARE Program provides a viable alternative should a victim be unable to reach a telephone to summon help. The cellular backup incorporated into the AWARE Program security equipment eases the constant fear and concern victims feel. It gives me peace of mind as well, knowing our citizens are able to live a less stressful life.

I look forward to continuing to work with you and to the continued success of the AWARE Program here in Anchorage.

Sincerely,

Walt Monegan
Chief of Police

Community, Security, Prosperity



**DEPARTMENT OF
POLICE**

ALBERT NÁJERA
CHIEF OF POLICE

STEVE SEGURA
DEPUTY CHIEF OF POLICE

RICK BRAZIEL
DEPUTY CHIEF OF POLICE

**CITY OF SACRAMENTO
CALIFORNIA**

**July 13, 2006
Ref #07-03**

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Ann Lindstrom
Director of Corporate Communication
ADT Security Services, Inc
One Town Center Drive
Boca Raton, FL 33486

Dear Ann:

We are grateful to ADT for bringing the AWARE Program to our community to help protect victims of Domestic Violence. In Sacramento the program is in its fourteenth year.

The program has not only helped protect people in grave danger, but this has also given these victims peace of mind, knowing that law enforcement officers can be rapidly summoned by the touch of a button.

Domestic Violence victims in the AWARE Program have been physically and mentally abused by their partners. These abusers continue to harass their victims despite protective orders by stalking, calling, threatening and continuing to do physical harm.

The AWARE Program provides a viable alternative should a victim be unable to reach a telephone to summon help. It gives me peace of mind as well, knowing victims in our community are able to live a less stressful life.

I would like to offer a special thank you to Cathy Barto-Meyer for making the program possible. To ADT Sacramento General Manager, Amanda Matthews and her staff, Kim Watson, Lisa Ronsheimer, installers David Green, Alex Giy and Rodney Johnson.

I look forward to continuing to work with ADT and the continued success of the AWARE Program here in Sacramento.

Sincerely,

Vince Davis
Alarm Unit
Sacramento Police Department

VD/kg

The mission of the Sacramento Police Department is to work in partnership with the Community to protect life and property; solve neighborhood problems, and enhance the quality of life in our City.



July 14, 2006

Mr. John Koch
Chief Operating Officer
ADT Security Services, Inc.
One Town Center Road
Boca Raton, FL 33486

Dear Mr. Koch:

On behalf of the staff and clients of Hubbard House, Inc. we would like to express our sincere gratitude for all that ADT has done and continues to do to help victims of domestic violence live safer lives.

The AWARE program through ADT installs a button attached to the home phone of a victim of domestic violence that, if pressed, contacts 911 and alerts that there is an emergency at the client's home. Another security measure provided by ADT is a pendant that a client can wear as a necklace, which has a similar button that alerts the authorities once it has been pressed. The system also has a cellular backup component. Through the AWARE program, emergency response equipment has been installed in hundreds of households in the greater Jacksonville, Florida area since inception in 1995.

Hubbard House was founded in 1976 and we are celebrating our 30th anniversary this year. Hubbard House was the first domestic violence shelter established in the Southeast and has been recognized throughout its history for its leadership in providing programs and services for victims of domestic violence, their children and their abusers. Hubbard House seeks to protect and empower victims and their children. Working actively to break the cycle of domestic violence, this agency offers a full compendium of domestic violence services for all family members caught in the web of abuse. Programs include: a 24-hour hotline, emergency shelter, therapeutic day care, community education, emergency response advocacy, outreach programs for victims and their children, court advocacy, prevention programs for children and teens, and an intervention program for men who batter. The AWARE program helps us offer our clients additional safety while they are not in the shelter. Each Hubbard House program -- whether it focuses on intervention or prevention -- contributes toward the agency's mission: Every Relationship Violence-Free.

Thank you again for your commitment to helping us work towards our mission. We are grateful that we have ADT as supporter and look forward to many more years of partnering with the AWARE program.

Sincerely,

Jani Gaff
Fund Development Coordinator

*Our Mission: Every Relationship Violence-Free
Providing Comprehensive Domestic Violence Services*

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MEN AGAINST VIOLENCE
AGAINST WOMEN
(904) 354-0076 ext. 642
www.mavaw.org



Alaska Woman's Coalition

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Quotes from Press Releases over the last three years about the AWARE® Program:

"A program that has received national acclaim for its efforts to assist in the protection of victims of domestic violence was launched by the Anchorage Mayor's Office, Anchorage Police Department, Abused Women's Aid In Crisis center (AWAIC), the Anchorage Municipal Attorney's Office and ADT Security Services, Inc."

"This unique program features the cooperation of both public and private sectors of the community. The law enforcement officials involved in the AWARE Program are convinced that it will help curtail the number of domestic violence crimes that occur in Anchorage". Said Anchorage Mayor Mark Begich. Mayor Begich further noted, "These security systems will provide important extra protection to the Anchorage residents who are deemed most at risk of harm or injury."

"We believe this program has the potential to make the victims of domestic violence safer in our community - a vital part of our mission in law enforcement" Captain Bill Miller of the Anchorage Police Department added.

Bruce Roberts, Deputy Municipal Attorney, City of Anchorage noted, "Those participating in the AWARE Program are victims of serious domestic abuse and are in the highest level of danger. The necklace pendants will serve as yet another tool for them to use in life-threatening situations. If a victim is unable to get to a telephone, having access to the pendant alarm could potentially save his or her life."

"Family violence may be happening in your own neighborhood without anyone knowing: cries for help may go unheard. Victims are often kept isolated from friends and family by their abusers. The ADT alarms will be an important part of our community response to the violence." said Sandra LeClair, AWAIC's Program Services Coordinator continuing. "We all have to work together to keep these victims safe."

The above words demonstrate the important role this company plays in our community as it provides a means to secure the lives of the victims, their family and possibly their co-workers as they reach to rise above the personal crisis they are encountering. A safe harbor that gives breathing room for growth, reflection and even forward movement.

I understand that presently there are nine (9) women utilizing the program and one other about to be given the security devices. A sad statement for our community, but a true second chance for those in the greatest need of safety.

The Alaska Women's Coalition is proud to endorse ADT for this award.

Respectfully,


Linda FRIDAY Cardoza, Officer



Alaska Women's Coalition

2781 Ruby Drive
Anchorage, Alaska 99502
907-440-9361 Direct - 907-762-3189 Fax

Thursday, July 13, 2006

Mr. John Koch
Chief Operating Officer
ADT Security Services, Inc.
One Town Center Drive
Boca Raton, FL 33486

RE: AWARE

Dear Mr. Koch,

ADT is on the forward edge and taking action to provide a security system for our community, a community that ranks #1 per capita in it's standings on rape and abuse against women.

This life saving program protects victims of domestic violence. Provides these victims and their families a peace of mind, knowing that law enforcement can be rapidly summoned while they are in the assumed safe haven of their home, all with the push of a button.

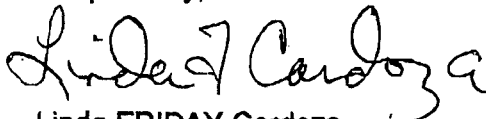
Domestic violence victims are fortunate to be given the AWARE programs assistance in securing a small corner of their lives, their homes. Abusers continue to harass their victims with physical and mental abuse, ignoring protective orders, stalking, calling, threatening, and simply making life unbearable.

This AWARE program serves as a viable alternative should a victim be unable to reach a telephone to summon help. The cellular backup incorporated into the AWARE program security equipment eases the constant state of fear and concern victims feel.

Women's organizations are proud to apprise their membership that there is a program that can assist them if they are experiencing an abusive situation. As abuse knows no class, no ethnicity, no religion, no age group, in it's perpetrators.

This organization, and it's broad range of membership is grateful ADT offers this program in it's menu of services to ours and other communities throughout this nation.

Respectfully,



Linda FRIDAY Cardoza
Alaska Women's Coalition

~~XXXXX Street~~
Temple Terrace, FL 33617

February 16, 2006

ADT Security
Attn: Jennifer Kylwin
5471 W. Waters Avenue Suite 1000
Tampa, FL 33634

Dear Ms. Kylwin,

This letter is to tell you how grateful I am to be receiving AWARE security services. The AWARE program has truly given me back my freedom, freedom from fear of dangerous retaliation from my ex-husband. My two teenagers are also protected by your program, and as a family, we have felt much more secure.

My ex-husband tried to strangle me to death several years ago. I had to testify against him for both that felony and several others. He was imprisoned and then released this past Thanksgiving. When I knew of his impending release, I felt once again the true meaning of terror. However, I happened to read of the AWARE program in the Tampa Tribune and immediately applied. The Spring and you have been very proactive in providing my family with our enhanced security. We have the panic alarms with us at all times.

Unless you have been a victim of violence, you can't know how the threat of repeated violence can affect you. I have post-traumatic stress disorder from my attack, and my children are also anxious about our situation. The AWARE alarms provide us with peace of mind; I tell my teenagers that they are like "bodyguards" who are always with us. Our panic alarms help us live a more normal life, although we still remain very cautious.

I am so appreciative that you cared enough to implement this program in Hillsborough County. As a single mom working two jobs, I feel that ADT is more than a business, it is a lifesaver. I am deeply appreciative of your efforts to help victims of violence. Thank you very much.

Sincerely,


Stephanie